



RE: Marathon Alaska Cook Inlet NPDES DMRs

San Miguel, Amanda L. to: Diane Davis

Cc: Hanh Shaw

07/23/2010 12:19 PM

Diane and Hanh,

I apologize for my late response to this. Yes, I am requesting that the suspension of DMR requirements continue for both Spark and Spurr Platforms (AKG-31-5010 and AKG-31-5014). Under the past permit we did not submit DMRs either, due to the fact that the platforms have been unmanned since 1992. It is my interpretation of the permit that DMRs would not be required. Please confirm that this is correct.

Thanks,

Amanda San Miguel

HES Professional

Marathon Alaska Production LLC

Direct: 907.565.3038

Cell: 907.529.0433

Fax: 907.565.3076

ALSanmiguel@marathonoil.com

-----Original Message-----

From: Davis.Diane@epamail.epa.gov [mailto:Davis.Diane@epamail.epa.gov]

Sent: Tuesday, July 06, 2010 12:57 PM

To: San Miguel, Amanda L.

Cc: Shaw.Hanh@epa.gov

Subject: Re: Marathon Alaska Cook Inlet NPDES DMRs

Hanh,

Should compliance monitoring for these platforms be turned off? And if so, what date should be used?

Amanda,

Are you requesting temporary suspension of DMR requirements for both platforms or just AKG315010?

Thank you.

Diane

From: "San Miguel, Amanda L." <alsanmiguel@marathonoil.com>

To: Diane Davis/R10/USEPA/US@EPA

Date: 06/29/2010 09:40 PM

Subject: Marathon Alaska Cook Inlet NPDES DMRs

Diane,

I spoke with you a few times regarding Marathon Alaska Production LLC's DMRs for the Cook Inlet General NPDES Permit. We currently have two inactive platforms (Spark & Spurr) covered under the permit for uncontaminated deck drainage only. I was looking a little closer at General NPDES Permit AKG-31-5000 for Cook Inlet Oil & Gas facilities, and there is a paragraph on Page 15 that says the following:

The permittee is not required to conduct monitoring for the facility when it is not staffed. The permittee must provide EPA and ADEC written notification that the facility is no longer staffed 30 days prior to terminating monitoring requirements.

Also, attached is a PDF letter that was sent to EPA in 1996 for one of our platforms. Our platforms have not been active or manned for some time, and consequently, we have not submitted DMRs since the permit states that no monitoring would be required in our circumstances. I wanted to get EPA concurrence that this is still the case, and see if you would still need us to fill out the pre-printed DMRs that were mailed to us. Please feel free to give me a call back to discuss.

Thanks,

Amanda San Miguel
HES Professional
Marathon Alaska Production LLC
Direct: 907.565.3038
Cell: 907.529.0433
Fax: 907.565.3076
ALSanmiguel@marathonoil.com

(See attached file: Marathon Cook Inlet NPDES Monitoring Letter.pdf)